

U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION

Southern Resource Center 61 Forsyth Street, Suite 17T26 Atlanta, Georgia 30303 September 27, 1999

IN REPLY REFER TO

SRC-AT

Mr. Dan Flowers
Director of Highways and Transportation
Arkansas State Highway Commission
P.O. Box 2261
Little Rock, Arkansas 72203-2261

Dear Mr. Flowers:

Thank you for the opportunity to review the I-69 Task C Report, Sections of Independent Utility.

As you know, the Intermodal Surface Transportation Efficiency Act (ISTEA), National Highway System Designation Act of 1995 (NHS), and the Transportation Equity Act for the 21st Century (TEA-21) have designated high priority corridors and connectors for I-69 in nine (9) states from Canada to Mexico.

The Transportation Equity Act for the 21st Century (TEA 21), signed into law on June 9, 1998, again redefined Corridor 18 and officially designated it as Interstate 69. The current definition includes the following stipulations:

- includes the I-69 facility from Indianapolis to Port Huron, Michigan/Sarnia, Ontario, Canada;
- includes the I-94 facility from Port Huron, through Detroit (including the Ambassador Bridge interchange) to Chicago, Illinois;
- requires that in Tennessee, Mississippi, Arkansas and Louisiana, the corridor follow the "alignment" generally identified in the Special Issues Study;
- adds a connection between the Corridor in the vicinity of Monticello, Arkansas, to Pine Bluff, Arkansas; and
- includes, in the Lower Rio Grande Valley:
 - (A) US 77 from the Mexican border to US 59 in Victoria, Texas;
 - (B) US 281 from the Mexican border to US 59, then to Victoria, Texas;
 - (C) the Corpus Christi Northside Highway and Rail Corridor from the intersection of US 77 and I-37 to US 181; and
 - (D) FM 511 from US 77 to the Port of Brownsville.

From a transportation planning perspective, the Corridor 18 Feasibility Study developed information regarding facility cost, economic benefits, economic development impacts, financial viability etc., and concluded that, on balance, the Nation and the corridor would derive benefits if Corridor 18 were built.

The Corridor 18 Special Issues Study built upon and extended the work of the Corridor 18 Feasibility Study as well as the Corridor 20 Feasibility Study. The following special issues were studied:

- The impact on the project's economic feasibility of redefining Corridor 18 to include an extension from Houston to the Lower Rio Grande Valley;
- The traffic impacts Corridor 18 would have on I-35; and
- The evaluation of major river crossing, connections between states, and connections to urban areas that will be key considerations for future location and environmental studies.

The aforementioned legislation and corridor planning and feasibility studies define the I-69 corridor and demonstrate economic benefits and financial viability for I-69. However, the advancement of work and projects must still be developed in accordance with the National Environmental Policy Act (NEPA). This means that efforts on I-69 are transitioning from the corridor planning and feasibility study stage to the FHWA NEPA and project development stage. However, we should continue to finalize as soon as possible the tasks to develop the purpose and need and modal choice decisions to be consistent with the national legislative and administrative intent and objectives. The types of work either already completed, ongoing, or planned vary from state to state, and location to location throughout the corridor. This work will have included the signing, widening, reconstruction and relocation of existing facilities to the development of entirely new facilities. The FHWA NEPA process, documentation, and approvals have already been applied to several projects and work activities throughout the corridor.

The extension of I-69 from Indianapolis to the Texas/Mexico border will cover a total length of more than 1600 miles. Realistically, this length precludes the planning, development, and decision-making of the full corridor as a single construction project. The individual States and I-69 Steering Committee have decided to pursue a practical approach of breaking I-69 into viable sections. Each section would be developed and constructed in a reasonable time frame to address state and local needs. However, as the state(s) advance each section, all efforts will be pursued to consider the national legislative and administrative intent and objectives for I-69.

The Task C Report on Sections of Independent Utility was developed to be consistent with the FHWA November 3, 1993, memorandum on establishing logical termini for a proposed project or action during the FHWA NEPA process. Our review of the Task C Report demonstrates an objective application and consistency with the FHWA November 3 memorandum. The report is approved to advance the individual sections to comply with the FHWA NEPA process, documentation and approvals. Decisions rendered during the FHWA NEPA process and approval will constitute Federal standing and commitment relative to project funding. In addition, advancement of each section must comply with the existing statewide and metropolitan transportation planning processes and other applicable Federal, State and local requirements.

As discussed at our May 21, 1999, meeting, I-69 is a massive undertaking for the nation and the implications are monumental. The challenges before us are unique, different in scale, and complex. Our normal and routine way of advancing projects will not apply. Using our existing procedures, processes and decision-making, we must apply special emphasis and techniques to advance I-69. The following challenges must still be addressed:

- Acceleration of project management, development, and decision making;
- Integration of FHWA NEPA, State DOT and local decision making;
- Fostering of Partnerships at Federal, State, and local levels;
- Ensuring Public Outreach and Involvement
- Collaborating and coordinating with Federal, State and local agencies.

Because of the scale of this endeavor and the challenges before us, I am requesting that the I-69 Steering Committee reconvene as soon as possible to discuss our next steps. If you have any questions, please contact me at 404-562-3570.

Sincerely yours,

ORIGINAL SIGNED BY EUGENE W. CLECKLEY

Eugene W. Cleckley Director, Southern Resource Center

cc: See attached list.

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cc:

- Mr. Kirk Brown, Illinois DOT
- Ms. Christine Klika, Indiana DOT
- Mr. Michael Hancock, Kentucky DOT
- Dr. Kam Movassaghi, Louisiana DOT
- Ms. Susan Hohl, Michigan DOT
- Mr. Kenneth Warren, Mississippi DOT
- Mr. J. Bruce Saltzman, Tennessee DOT
- Mr. Al Luedecke, Texas DOT
- Mr. Ken Perret, FHWA, Arkansas
- Mr. Ron Marshall, FHWA, Illinois
- Mr. Art Fendrick, FHWA, Indiana
- Mr. Jesse Story, FHWA, Kentucky
- Mr. Tony Sussman, FHWA, Louisiana
- Mr. Jim Steele, FHWA, Michigan
- Mr. Andy Hughes, FHWA, Mississippi
- Mr. Chuck Boyd, FHWA, Tennessee
- Mr. Dan Reagan, FHWA, Texas